



U.S. Department
of Transportation
**National Highway
Traffic Safety
Administration**

DEC 27 2011

1200 New Jersey Avenue SE.
Washington, DC 20590

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

David Dillon, Director
Product Investigations & Campaigns
Chrysler Group, LLC
800 Chrysler Drive - CIMS 482-00-91
Auburn Hills, MI 48326-2757

NVS-212am
EA11-010

Dear Mr. Dillon:

This letter is to inform you that the Office of Defects Investigation (ODI) of the National Highway Traffic Safety Administration (NHTSA) has upgraded Preliminary Evaluation (PE) 10-022 to an Engineering Analysis (EA) 11-010 to investigate allegations of headlight malfunction in model year (MY) 2005-2007 Chrysler Town and Country, Voyager, and Dodge Grand Caravan and Caravan vehicles manufactured by Chrysler LLC (Chrysler), and to request certain information. PE 10-022 initially covered only MY 2005 Chrysler Town and Country, Voyager, and Dodge Grand Caravan and Caravan vehicles. However, based on information from Chrysler's PE Information Request response dated September 3, 2010, and confirmation by Chrysler that the same headlight switch in the MY 2005 Chrysler Town and Country, Voyager, and Dodge Grand Caravan and Caravan vehicles is used in the MY 2006 and 2007 Chrysler Town and Country, Voyager, and Dodge Grand Caravan and Caravan vehicles, ODI has expanded the scope of investigation to include MY 2006 and 2007 vehicles as well. We consider MY 2004 and 2008 vehicles to be a possible baseline.

ODI has received a total of 146 complaints alleging headlight malfunction in MY 2005 Chrysler Town and Country, Voyager, and Dodge Grand Caravan and Caravan vehicles. We received 75 complaints prior to the opening of PE10-022. Since then, we received a total of 71 complaints. Complainants state that the headlights are not functioning properly. They allege that both headlights will flicker, dim, fail to illuminate, and/or illuminate and then extinguish completely, on either a continuous or intermittent basis. This occurs at start up, and while the vehicles are being driven on roads and highways. A copy of each Vehicle Owner Questionnaire (VOQ) ODI received has been emailed to your office, and the identification number for each report is listed at the end of this letter.

Unless otherwise stated in the text, the following definitions apply to these information requests:

- **Subject vehicles:** MY 2005-2007 Chrysler Town and Country, Voyager, and Dodge Grand Caravan and Caravan vehicles manufactured for sale or lease in the United States.



- **Peer vehicles:** MY 2004 and 2008 Chrysler Town and Country, Voyager, and Dodge Grand Caravan and Caravan vehicles manufactured for sale or lease in the United States.
- **Subject components:** All switches, relays, wiring, body control modules, front control modules, integrated power modules, and other devices with parts that control the illumination of the headlights, or could cause or contribute to their not illuminating when the headlight switch is in the on position.
- **Chrysler:** Chrysler Group LLC, Chrysler LLC, Daimler Chrysler LLC, all of their past and present officers and employees, whether assigned to their principal offices or any of its field or other locations, including all of their divisions, subsidiaries (whether or not incorporated) and affiliated enterprises and all of their headquarters, regional, zone and other offices and their employees, and all agents, contractors, consultants, attorneys and law firms and other persons engaged directly or indirectly (e.g., employee of a consultant) by or under the control of Chrysler (including all business units and persons previously referred to), who are or, in or after 1999, were involved in any way with any of the following related to the alleged defect in the subject vehicles:
 - a. Design, engineering, analysis, modification or production (e.g. quality control);
 - b. Testing, assessment or evaluation;
 - c. Consideration, or recognition of potential or actual defects, reporting, record-keeping and information management, (e.g., complaints, field reports, warranty information, part sales), analysis, claims, or lawsuits; or
 - d. Communication to, from or intended for zone representatives, fleets, dealers, or other field locations, including but not limited to people who have the capacity to obtain information from dealers.
- **Alleged defect:** The headlights flicker, dim, fail to illuminate, and/or illuminate and extinguish, on either a continuous or an intermittent basis.
- **Alleged condition:** The headlights flicker, dim, fail to illuminate, and/or illuminate and extinguish, on either a continuous or an intermittent basis.
- **Document:** "Document(s)" is used in the broadest sense of the word and shall mean all original written, printed, typed, recorded, or graphic matter whatsoever, however produced or reproduced, of every kind, nature, and description, and all non-identical copies of both sides thereof, including, but not limited to, papers, letters, memoranda, correspondence, communications, electronic mail (e-mail) messages (existing in hard copy and/or in electronic storage), faxes, mailgrams, telegrams, cables, telex messages, notes, annotations, working papers, drafts, minutes, records, audio and video recordings, data, databases, other information bases, summaries, charts, tables, graphics, other visual displays, photographs, statements, interviews, opinions, reports, newspaper articles, studies, analyses, evaluations, interpretations, contracts, agreements, jottings, agendas, bulletins, notices, announcements, instructions, blueprints, drawings, as-builts, changes, manuals, publications, work schedules, journals, statistical data, desk, portable and computer calendars, appointment books, diaries, travel reports, lists, tabulations,

computer printouts, data processing program libraries, data processing inputs and outputs, microfilms, microfiches, statements for services, resolutions, financial statements, governmental records, business records, personnel records, work orders, pleadings, discovery in any form, affidavits, motions, responses to discovery, all transcripts, administrative filings and all mechanical, magnetic, photographic and electronic records or recordings of any kind, including any storage media associated with computers, including, but not limited to, information on hard drives, floppy disks, backup tapes, and zip drives, electronic communications, including but not limited to, the Internet and shall include any drafts or revisions pertaining to any of the foregoing, all other things similar to any of the foregoing, however denominated by Chrysler, any other data compilations from which information can be obtained, translated if necessary, into a usable form and any other documents. For purposes of this request, any document which contains any note, comment, addition, deletion, insertion, annotation, or otherwise comprises a non-identical copy of another document shall be treated as a separate document subject to production. In all cases where original and any non-identical copies are not available, "document(s)" also means any identical copies of the original and all non-identical copies thereof. Any document, record, graph, chart, film or photograph originally produced in color must be provided in color. Furnish all documents whether verified by Chrysler or not. If a document is not in the English language, provide both the original document and an English translation of the document.

- **Other Terms:** To the extent that they are used in these information requests, the terms "claim," "consumer complaint," "dealer field report," "field report," "fire," "fleet," "good will," "make," "model," "model year," "notice," "property damage," "property damage claim," "rollover," "type," "warranty," "warranty adjustment," and "warranty claim," whether used in singular or in plural form, have the same meaning as found in 49 CFR 579.4.

In order for my staff to evaluate the alleged defect, certain information is required. Pursuant to 49 U.S.C. § 30166, please provide numbered responses to the following information requests. Insofar as Chrysler has previously provided a document to ODI, Chrysler may produce it again or identify the document, the document submission to ODI in which it was included and the precise location in that submission where the document is located. When documents are produced, the documents shall be produced in an identified, organized manner that corresponds with the organization of this information request letter (including all individual requests and subparts). When documents are produced and the documents would not, standing alone, be self-explanatory, the production of documents shall be supplemented and accompanied by explanation.

Please repeat the applicable request verbatim above each response. After Chrysler's response to each request, identify the source of the information and indicate the last date the information was gathered.

1. State, by model and model year, the number of subject vehicles Chrysler has manufactured for sale or lease in the United States. Separately, for each subject vehicle manufactured to date by Chrysler, state the following:

- a. Vehicle identification number (VIN);
- b. Make;
- c. Model;
- d. Model Year;
- e. Date of manufacture;
- f. Date warranty coverage commenced; and
- g. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

Provide this information in a Microsoft Access 2007 file, or a compatible format, entitled "PRODUCTION DATA."

2. State, by model and model year, the number of peer vehicles Chrysler has manufactured for sale or lease in the United States. Separately, for each peer vehicle manufactured to date by Chrysler, state the following:
 - a. Vehicle identification number (VIN);
 - b. Make;
 - c. Model;
 - d. Model Year;
 - e. Date of manufacture;
 - f. Date warranty coverage commenced; and
 - g. The State in the United States where the vehicle was originally sold or leased (or delivered for sale or lease).

Provide this information in a Microsoft Access 2007 file, or a compatible format, entitled "PEER PRODUCTION DATA."

3. State the number of each of the following, received by Chrysler, or of which Chrysler is otherwise aware, which relate to, or may relate to, the alleged defect in the subject vehicles:
 - a. Consumer complaints, including those from fleet operators;
 - b. Field reports, including dealer field reports;
 - c. Reports involving a crash, injury, or fatality, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a subject vehicle, property damage claims, consumer complaints, or field reports;
 - d. Property damage claims; and
 - e. Third-party arbitration proceedings where Chrysler is or was a party to the arbitration; and
 - f. Lawsuits, both pending and closed, in which Chrysler is or was a defendant or codefendant.

For subparts "a" through "d" state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint).

In addition, for items “c” and “d,” provide a summary description of the alleged problem and causal and contributing factors and Chrysler’s assessment of the problem, with a summary of the significant underlying facts and evidence. For items “e” and “f,” identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

4. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 3, state the following information:
 - a. Chrysler’s file number or other identifier used;
 - b. The category of the item, as identified in Request No. 3 (i.e., consumer complaint, field report, etc.);
 - c. Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
 - d. Vehicle’s VIN;
 - e. Vehicle’s make, model and model year;
 - f. Vehicle’s mileage at time of incident;
 - g. Incident date;
 - h. Report or claim date;
 - i. Whether a crash is alleged;
 - j. Whether property damage is alleged;
 - k. Number of alleged injuries, if any; and
 - l. Number of alleged fatalities, if any.

Provide this information in a Microsoft Access 2007 file, or a compatible format, entitled “REQUEST NUMBER THREE DATA.”

5. Produce copies of all documents related to each item within the scope of Request No. 3. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method Chrysler used for organizing the documents.
6. State the number of each of the following, received by Chrysler, or of which Chrysler is otherwise aware, which relate to, or may relate to, the alleged condition in the peer vehicles:
 - a. Consumer complaints, including those from fleet operators;
 - b. Field reports, including dealer field reports;
 - c. Reports involving a crash, injury, or fatality, based on claims against the manufacturer involving a death or injury, notices received by the manufacturer alleging or proving that a death or injury was caused by a possible defect in a subject vehicle, property damage claims, consumer complaints, or field reports;
 - d. Property damage claims; and
 - e. Third-party arbitration proceedings where Chrysler is or was a party to the arbitration; and
 - f. Lawsuits, both pending and closed, in which Chrysler is or was a defendant or codefendant.

For subparts “a” through “d” state the total number of each item (e.g., consumer complaints, field reports, etc.) separately. Multiple incidents involving the same vehicle are to be

counted separately. Multiple reports of the same incident are also to be counted separately (i.e., a consumer complaint and a field report involving the same incident in which a crash occurred are to be counted as a crash report, a field report and a consumer complaint).

In addition, for items "c" and "d," provide a summary description of the alleged problem and causal and contributing factors and Chrysler's assessment of the problem, with a summary of the significant underlying facts and evidence. For items "e" and "f," identify the parties to the action, as well as the caption, court, docket number, and date on which the complaint or other document initiating the action was filed.

7. Separately, for each item (complaint, report, claim, notice, or matter) within the scope of your response to Request No. 6, state the following information:
 - a. Chrysler's file number or other identifier used;
 - b. The category of the item, as identified in Request No. 6 (i.e., consumer complaint, field report, etc.);
 - c. Vehicle owner or fleet name (and fleet contact person), address, and telephone number;
 - d. Vehicle's VIN;
 - e. Vehicle's make, model and model year;
 - f. Vehicle's mileage at time of incident;
 - g. Incident date;
 - h. Report or claim date;
 - i. Whether a crash is alleged;
 - j. Whether property damage is alleged;
 - k. Number of alleged injuries, if any; and
 - l. Number of alleged fatalities, if any.

Provide this information in a Microsoft Access 2007 file, or a compatible format, entitled "REQUEST NUMBER SIX DATA."

8. Produce copies of all documents related to each item within the scope of Request No. 6. Organize the documents separately by category (i.e., consumer complaints, field reports, etc.) and describe the method Chrysler used for organizing the documents.
9. State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by Chrysler to date that relate to, or may relate to, the alleged defect in the subject vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.

Separately, for each such claim, state the following information:

- a. Chrysler's claim number;
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
- c. VIN;
- d. Repair date;
- e. Vehicle mileage at time of repair;

- f. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- g. Labor operation number;
- h. Problem code;
- i. Replacement part number(s) and description(s); If Body Control Module (BCM) was replaced, state what condition it was replaced for i.e. headlights out, headlights won't turn off etc.
- j. Concern stated by customer; and
- k. Comment, if any, by dealer/technician relating to claim and/or repair.

Provide this information in a Microsoft Access 2007 file, or a compatible format, entitled "WARRANTY DATA."

10. Describe in detail the search criteria used by Chrysler to identify the claims identified in response to Request No. 9, including the labor operations, problem codes, part numbers and any other pertinent parameters used. Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions applicable to the alleged defect in the subject vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by Chrysler on the subject vehicles (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered). Describe any extended warranty coverage option(s) that Chrysler offered for the subject vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.
11. State, by model and model year, a total count for all of the following categories of claims, collectively, that have been paid by Chrysler to date that relate to, or may relate to, the alleged condition in the peer vehicles: warranty claims; extended warranty claims; claims for good will services that were provided; field, zone, or similar adjustments and reimbursements; and warranty claims or repairs made in accordance with a procedure specified in a technical service bulletin or customer satisfaction campaign.

Separately, for each such claim, state the following information:

- a. Chrysler's claim number;
- b. Vehicle owner or fleet name (and fleet contact person) and telephone number;
- c. VIN;
- d. Repair date;
- e. Vehicle mileage at time of repair;
- f. Repairing dealer's or facility's name, telephone number, city and state or ZIP code;
- g. Labor operation number;
- h. Problem code;
- i. Replacement part number(s) and description(s); If Body Control Module (BCM) was replaced, state what condition it was replaced for i.e. headlights out, headlights won't turn off etc.
- j. Concern stated by customer; and
- k. Comment, if any, by dealer/technician relating to claim and/or repair.

Provide this information in a Microsoft Access 2007 file, or a compatible format, entitled "PEER WARRANTY DATA."

12. Describe in detail the search criteria used by Chrysler to identify the claims identified in response to Request No. 11, including the labor operations, problem codes, part numbers and any other pertinent parameters used. Provide a list of all labor operations, labor operation descriptions, problem codes, and problem code descriptions applicable to the alleged defect in the subject vehicles. State, by make and model year, the terms of the new vehicle warranty coverage offered by Chrysler on the peer vehicles (i.e., the number of months and mileage for which coverage is provided and the vehicle systems that are covered). Describe any extended warranty coverage option(s) that Chrysler offered for the subject vehicles and state by option, model, and model year, the number of vehicles that are covered under each such extended warranty.
13. State the number of out-of-warranty dealer repairs that have been made which relate to, or may relate to, the alleged defect in the subject vehicles and produce all documents that relate to, or may relate to such repairs.
14. State the number of out-of-warranty dealer repairs that have been made which relate to, or may relate to, the alleged defect in the peer vehicles and produce all documents that relate to, or may relate to such repairs.
15. Produce copies of all service, warranty, and other documents that relate to, or may relate to, the alleged defect in the subject vehicles, that Chrysler has issued to any dealers, regional or zone offices, field offices, fleet purchasers, or other entities. This includes, but is not limited to, bulletins, advisories, informational documents, training documents, or other documents or communications, with the exception of standard shop manuals. Also include the latest draft copy of any communication that Chrysler is planning to issue within the next 120 days.
16. Describe all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations (collectively, "actions") that relate to, or may relate to, the alleged defect in the subject vehicles that have been conducted, are being conducted, are planned, or are being planned by, or for, Chrysler. Ensure that this response includes testing or analysis conducted either by Chrysler or its suppliers, on any and all headlamp switches returned to Chrysler or the supplier, from field service or other consumer use. For each such action, provide the following information:
 - a. Action title or identifier;
 - b. The actual or planned start date;
 - c. The actual or expected end date;
 - d. Brief summary of the subject and objective of the action;
 - e. Engineering group(s)/supplier(s) responsible for designing and for conducting the action; and
 - f. A brief summary of the findings and/or conclusions resulting from the action.

For each action identified, provide copies of all documents related to the action, regardless of whether the documents are in interim, draft, or final form. Organize the documents chronologically by action.

17. Describe all modifications or changes made by, or on behalf of, Chrysler in the design, material composition, manufacture, quality control, supply, or installation of any of the subject components, including original equipment (production) and service parts, from the start of production to date, which relate to, or may relate to, the alleged defect in the subject vehicles. For each such modification or change, provide the following information:
- a. The date or approximate date on which the modification or change was incorporated into vehicle production;
 - b. A detailed description of the modification or change;
 - c. The reason(s) for the modification or change;
 - d. The part numbers (service and engineering) of the original component;
 - e. The part number (service and engineering) of the modified component;
 - f. Whether the original unmodified component was withdrawn from production and/or sale, and if so, when;
 - g. When the modified component was made available as a service component; and
 - h. Whether the modified component can be interchanged with earlier production components.

Also, provide the above information for any modification or change that Chrysler is aware of which may be incorporated into vehicle production within the next 120 days.

18. Separately, by component name, part number (both service and engineering/production), state the (i) model and model year of the vehicles in which each of the following subject components may properly be installed as a service part, and (ii) sales numbers by month/year from 2004 to the present:
- a. Switches, relays, wiring, body control modules, front control modules, integrated power modules, and other devices with parts that control the headlights on subject vehicles and peer vehicles; and
 - b. Any kits that have been released, or developed, by Chrysler for use in service repairs to such switches, relays, wiring, body control modules, front control modules, integrated power modules, and other devices with parts that control the headlights.

For each component part number, provide the supplier's name, address, and appropriate point of contact (name, title, and telephone number). Also identify by make, model and model year, any other vehicles of which Chrysler is aware that contain the identical component, whether installed in production or in service, and state the applicable dates of production or service usage.

19. Regarding the headlight control switch (switch) installed in the subject vehicles:
- a. State the design intent cycle life for the headlight control switch (i.e. how many cycles the headlight control switch is intended to last, where one cycle is defined as switching the headlight switch on and off once) in (i) cycles per year and (ii) entire design intent life cycle;

- b. Describe any adverse effects vibration has on the switch, describe any testing conducted to assess these effects, and provide the results of any testing conducted;
 - c. Describe any adverse effects humidity has on the switch, describe any testing conducted to assess these effects, and provide the results of any testing conducted;
 - d. Describe the process Chrysler used to select and qualify the supplier of the switch;
 - e. Describe the manufacturing and/or production processes used by the switch supplier;
 - f. Describe how debris or foreign material may collect in the switch cell area of the switch, and how debris may affect contact #2 of the switch cell¹;
 - g. Further to item 'f,' state whether debris may have, or did collect during the manufacture of the switch, describe in detail the debris that may collect (material, size, origin, etc), and state what if any actions Chrysler took to mitigate this issue including any action to purge the production or service parts supply of potentially substandard headlight switches;
 - h. Further to item 'f,' state whether debris may have, or does collect during consumers' use of the vehicle, describe in detail the debris that may collect (material, size, origin, etc), and state whether there is any scenario where the debris may escape the switch cell area;
 - i. Describe the plating material used, and the thickness specified, for the switch contacts;
 - j. State whether the switch contacts were designed for low current, and if so, explain what measures were taken to accomplish this;
 - k. Describe any lubrication specified for use on the switch contacts, and state the purpose of the lubrication (i.e., to prevent corrosion, increase life); and
 - l. List all other makes, models, and model years of Chrysler products that utilize a similar headlight control system design approach (i.e., where the headlight switch acts as a resistive network and produces an analog output voltage that is interpreted by a BCM).
20. In the last paragraph of Chrysler's PE10-022 IR response to ODI, dated September 3, 2010, Chrysler states "Furthermore, corrective action was taken by the headlamp supplier, TRW, during early 2006 MY production." Describe in detail
- a. the corrective action taken by TRW;
 - b. the condition it was intended to address;
 - c. the conclusions reached by TRW and Chrysler regarding the condition the corrective action was intended to address and the corrective action itself; and
 - d. the effectiveness of the action that was taken.
21. Produce all documents sent to TRW and received from TRW related to the alleged defect and/or the corrective action, including any studies, tests, or evaluations conducted in connection with the corrective action and conclusions reached, and all communications between Chrysler and TRW related to the corrective action.
22. Identify all persons (by name, email, organizational unit, and facility location) at TRW with whom Chrysler dealt regarding the corrective action to the headlights identified in Request No. 20 above.

¹ Contact # 2 of the switch cell is identified in a drawing on the page bates numbered PE10-022-Chrysler-106 of Chrysler's PE10-022 IR response. The switch cell area is also shown on this drawing and further identified in a flowchart on the page bates numbered PE10-022-Chrysler-101 of Chrysler's PE10-022 IR response.

23. State whether or not the Body Control Module (BCM) installed in the subject vehicles can be software reprogrammed (reflashed) with respect to headlight performance and if so describe the process required to conduct the BCM reflash, and state whether or not service technicians at Chrysler dealerships have the equipment and training to conduct a BCM reflash.
24. Furnish Chrysler's assessment of the alleged defect in the subject vehicle, including:
- The causal or contributory factor(s);
 - The failure mechanism(s);
 - The failure mode(s);
 - The risk to motor vehicle safety that it poses;
 - What warnings, if any, the operator and the other persons both inside and outside the vehicle would have that the alleged defect was occurring or subject component was malfunctioning; and
 - The reports included with this inquiry.

This letter is being sent to Chrysler pursuant to 49 U.S.C. § 30166(b), (e), which authorizes NHTSA to conduct any investigation that may be necessary to enforce Chapter 301 of Title 49 and to request reports and the production of things. It constitutes a new request for information. Chrysler's failure to respond promptly and fully to this letter could subject Chrysler to civil penalties pursuant to 49 U.S.C. § 30165 or lead to an action for injunctive relief pursuant to 49 U.S.C. § 30163. (Other remedies and sanctions are available as well.) Please note that maximum civil penalties under 49 U.S.C. § 30165 have increased as a result of the recent enactment of the Transportation Recall Enhancement, Accountability, and Documentation (TREAD) Act, Public Law No. 106-414 (signed November 1, 2000). Section 5(a) of the TREAD Act, codified at 49 U.S.C. § 30165(a), provides for civil penalties of up to \$6,000 per day, with a maximum of \$17,350,000 for a related series of violations, for failing or refusing to perform an act required under 49 U.S.C. § 30166. *See* 49 CFR 578.6 (as amended by 75 Fed. Reg. 79,978 (Dec. 21, 2010)). This includes failing to respond to ODI information requests.

If Chrysler cannot respond to any specific request or subpart(s) thereof, please state the reason why it is unable to do so. If on the basis of attorney-client, attorney work product, or other privilege, Chrysler does not submit one or more requested documents or items of information in response to this information request, Chrysler must provide a privilege log identifying each document or item withheld, and stating the date, subject or title, the name and position of the person(s) from, and the person(s) to whom it was sent, and the name and position of any other recipient (to include all carbon copies or blind carbon copies), the nature of that information or material, and the basis for the claim of privilege and why that privilege applies.

Chrysler's response to this letter, in duplicate, together with a copy of any confidentiality request, must be submitted to this office by **February 24, 2012**. All business confidential information must be submitted directly to the Office of Chief Counsel as described in the following paragraph and should not be sent to this office. In addition do not submit any business confidential information in the body of the letter submitted to this office. Please refer to EA11-010 in Chrysler's response to this letter and in any confidentiality request submitted to the Office of Chief Counsel. If Chrysler finds that it is unable to provide all of the information requested within the time allotted, Chrysler must request an extension from me at (202) 366-8089 no later

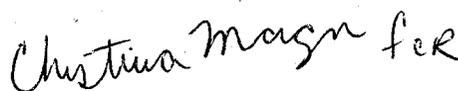
than five business days before the response due date. If Chrysler is unable to provide all of the information requested by the original deadline, it must submit a partial response by the original deadline with whatever information Chrysler then has available, even if an extension has been granted.

If Chrysler claims that any of the information or documents provided in response to this information request constitute confidential commercial material within the meaning of 5 U.S.C. § 552(b)(4), or are protected from disclosure pursuant to 18 U.S.C. § 1905, Chrysler must submit supporting information together with the materials that are the subject of the confidentiality request, in accordance with 49 CFR Part 512, as amended, to the Office of Chief Counsel (NCC-111), National Highway Traffic Safety Administration, Room W41-227, 1200 New Jersey Avenue, S.E., Washington, D.C. 20590. Chrysler is required to submit two copies of the documents containing allegedly confidential information (except only one copy of blueprints) and one copy of the documents from which information claimed to be confidential has been deleted. Please remember that the word "CONFIDENTIAL BUSINESS INFORMATION" must appear at the top of each page containing information claimed to be confidential, and the information must be clearly identified in accordance with 5 U.S.C. § 512.6. If you submit a request for confidentiality for all or part of your response to this IR, that is in an electronic format (e.g., CD-ROM), your request and associated submission must conform to the new requirements in NHTSA's Confidential Business Information Rule regarding submissions in electronic formats (49 CFR 512.6(c)). See 72 Fed. Reg. 59,434 (Oct. 19, 2007).

Please send email notification to Ali Motamedamin (Ali.Motamedamin@dot.gov) and to ODI_IRresponse@dot.gov when Chrysler sends its response to this office and indicate whether there is confidential information as part of Chrysler's response.

If you have any technical questions concerning this matter, please call Ali Motamedamin of my staff, at (202) 366-7021.

Sincerely,



Frank S. Borris, Director
Office of Defects Investigation
Enforcement

Vehicle Owner Questionnaire Numbers:

EA11-010 Opening Complaints

10417812 10411452 10409508 10409285 10406279 10406055 10404219 10403931 10402653
10400846 10400312 10399406 10398408 10395380 10395256 10394256 10393178 10390330
10390180 10390166 10389676 10386796 10381742 10381486 10380831 10377431 10376088
10375592 10371154 10370577 10370401 10370052 10368446 10366118 10365879 10365625
10364694 10364120 10363059 10359217 10357834 10353910 10353845 10353336 10352286
10351881 10350182 10348512 10347880 10347878 10347493 10347172 10345710 10344721
10344519 10344036 10343765 10340332 10336337 10336026 10336019 10334794 10333892
10332728 10331647 10331565 10331366 10331292 10330820 10330674 10329903

PE10-022 Previously Submitted Complaints

10329688 10328095 10327326 10327319 10327178 10326289 10326255 10325787 10325239
10324898 10323541 10323019 10322621 10322550 10320963 10320047 10318838 10315221
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